

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE COMPANY,
et al.,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP
and TRENWICK AMERICA
REINSURANCE CORPORATION,
Defendants.

CIVIL ACTION NO: 05-11840-MLW

**ASSENTED TO MOTION TO FILE UNDER SEAL
DEFENDANT TRENWICK AMERICA REINSURANCE CORPORATION'S
MEMORANDUM IN SUPPORT OF ITS MOTION TO STAY**

Defendant Trenwick America Reinsurance Corporation ("Trenwick") hereby moves to file under seal the following pleading:

- **TRENWICK AMERICA REINSURANCE CORPORATION'S
MEMORANDUM IN SUPPORT OF ITS MOTION TO STAY.**

Trenwick respectfully requests permission to file this pleading under seal because it quotes portions of a Statement of Position that Plaintiffs submitted in connection with a confidential arbitration between Plaintiffs and co-defendant, American International Group ("AIG"). In accordance with the Local Rules, Trenwick respectfully request that this pleading be impounded until the final resolution of this litigation between the parties, at which time it will be retrieved by counsel for Trenwick.

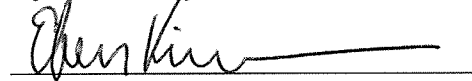
WHEREFORE, it is respectfully requested that the Court grant this assented-to motion to file the above-described document under seal.

Certification Pursuant to Local Rule 7.1

Trenwick's counsel certifies that pursuant to Local Rule 7.1, counsel for Trenwick and the Plaintiffs have conferred regarding the issue presented by this motion, and Plaintiffs' counsel assented to this motion.

**TRENWICK AMERICA
REINSURANCE CORPORATION**

By its attorneys,



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Dated: September 15, 2005

CERTIFICATE OF SERVICE

I, Eben A. Krim, counsel for Defendant Trenwick America Reinsurance Corporation, hereby certify that on September 15, 2005, I caused a copy of the foregoing document to be served by overnight delivery on all known counsel of record.



Eben A. Krim